

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:	:	
Douglas D. Hails	:	Case No. 13-24767GLT
Lynn G. Hails	:	
Aka Lynn H. Jackson	:	Chapter 13
Debtor(s)	:	
Capital One Auto Finance	:	
A Division of Capital One, N.A.	:	Re Doc.77
Movant(s)	:	
	:	
vs.	:	
Douglas D. Hails	:	
Lynn H. Hails	:	Hearing Date 8/10/2016
Aka Lynn H. Jackson	:	
Respondent(s)	:	

TRUSTEE'S RESPONSE TO MOTION FOR RELIEF FROM AUTOMATIC STAY

Ronda J. Winnecour, Chapter 13 Trustee, by her undersigned counsel,
respectfully represents the following:

1. Capital One Auto Finance, a secured creditor in the above-captioned bankruptcy case, requests relief from stay with regard to one 2011 Kia Sorento.
2. The Debtors listed the value of the property as \$15,503.00 in their petition.
3. Movant lists the balance due on the claim as of April 28, 2016 as \$16,384.81.
4. Movant alleges that the Debtors are in default to the Trustee in the amount of \$12,100.00.
5. As of July 22, 2016, the Trustee's records indicate that the Debtors are only delinquent to the Trustee in the amount of \$2,875.00.
6. The Movant allege that contractual payments on the loan are past due for the months of February through June 2016, totaling \$1,981.80.
7. The Trustee's records indicate that \$1,878.89 was distributed to the Movant for the months of February through June 2016.

8. Because a total of \$2,449.20 was due for that time period pursuant to the monthly payment, the Trustee avers that Movant is due \$570.31 for those months.

WHEREFORE, the Trustee respectfully reports to the Court

RONDA J. WINNECOUR,
CHAPTER 13 TRUSTEE

Date: 07/25/16

by /s/ Jana S. Pail
Jana S. Pail - PA I.D. #88910
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CERTIFICATE OF SERVICE

I hereby certify that on the 25th of July 2016, I served one true and correct copy of the foregoing document on the following parties in interest by United States first-class mail, postage prepaid, addressed as follows:

Joseph S. Sisca, Esquire
Assistant U.S. Trustee
Suite 970, Liberty Center
1001 Liberty Avenue
Pittsburgh PA. 15222

Douglas and Lynn Hails
41 Nancy Drive
Jeannette PA 15644

Mark G. Moynihan, Esquire
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Pittsburgh PA 15219

Martin Mooney, Esquire
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/s/Dianne DeFoor
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